

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC, *et al.*,

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**PROPOSED ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. § 362(d) SOLELY TO THE EXTENT IT APPLIES**

Upon the motion (the “Motion”) of Ocean Network Express (North America) Inc. (“ONE”), by and through its undersigned attorneys, pursuant to section 362(d) of title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”), for an order granting relief from the automatic bankruptcy stay, to allow ONE to execute its maritime lien on certain cargo in its physical or constructive possession (the “Cargo”); or, to return the Cargo to the shippers of the Cargo as defined in the Motion (the “Shippers”) or allow the Shippers to divert the Cargo; or, alternatively, to compel Joann Inc., *et al.* (the “Debtors”) to abandon the Cargo pursuant to section 554(b) of the Bankruptcy Code and for a determination that the Debtors have abandoned the Cargo; and for good cause having been shown; it is hereby:

ORDERED that, without determining that the automatic stay applies to the Cargo, and solely to the extent that it applies, the automatic stay is lifted to allow ONE, in its sole discretion, to sell or otherwise dispose of the Cargo without notice to the Debtors and, without determining that the Debtors hold any liens, claims, encumbrances, or interests in the Cargo, any such sale or disposition shall be free and clear of any liens, claims, encumbrances, and interests of the Debtors, and it is further

ORDERED that, to the extent authorization from this Court is required, ONE is authorized to immediately: (i) apply the proceeds of any sale of the Cargo to pay its freight, detention and/or demurrage charges; (ii) return the Cargo to the shippers; or (iii) allow the Shippers to divert the Cargo; and it is further

ORDERED that this Order is effective immediately and the fourteen (14) day stay period imposed by Federal Rule of Bankruptcy Procedure 4001(a)(4) with respect to the lifting of the automatic stay is waived.